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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
MIGUEL CAMARGO, JR.,  
  
Defendant.

CASE NO. 2:23-CR-111-DJC

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER

DATE: February 27, 2025

TIME: 9:30 a.m.

COURT: Hon. Daniel J. Calabretta

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on December 20, 2024, before the Honorable Dena M. Coggins, and time was excluded through that date, under Local Code T4.

2. On December 11, 2024, this case was reassigned to the Honorable Daniel J. Calabretta. ECF 43. Following the reassignment order, the December 20, 2024 status conference was vacated. ECF 44.

3. By this stipulation, the parties request to reset the status conference for February 27, 2025, at 9:00 a.m., and to exclude time between December 20, 2024, and February 27, 2025, under Local Code T4.

4. The parties agree and stipulate, and request that the Court find the following:

1 a) The government has represented that the discovery associated with this case  
2 includes approximately 4,761 pages of law enforcement reports, search warrant materials,  
3 financial records, and other evidence, including audio and video recordings, as well as the  
4 voluminous downloaded contents of two seized cell phones. All of this discovery has been either  
5 produced directly to counsel and/or made available for inspection and copying.

6 b) Counsel for defendant desires additional time to review this discovery, conduct  
7 defense investigation, confer with his client regarding his options for responding to the charges,  
8 and otherwise prepare for trial.

9 c) Counsel for defendant believes that failure to grant the above-requested  
10 continuance to February 27, 2025, would deny him the reasonable time necessary for effective  
11 preparation, taking into account the exercise of due diligence.

12 d) The government does not object to the continuance.

13 e) Based on the above-stated findings, the ends of justice served by continuing the  
14 case as requested outweigh the interest of the public and the defendant in a trial within the  
15 original date prescribed by the Speedy Trial Act.

16 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
17 et seq., within which trial must commence, the time period of December 20, 2024 to February  
18 27, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local  
19 Code T4] because it results from a continuance granted by the Court at defendant's request on  
20 the basis of the Court's finding that the ends of justice served by taking such action outweigh the  
21 best interest of the public and the defendant in a speedy trial.

22 5. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
23 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
24 must commence.

25 IT IS SO STIPULATED.  
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1 Dated: December 12, 2024

PHILLIP A. TALBERT  
United States Attorney

2  
3 /s/ DAVID W. SPENCER  
DAVID W. SPENCER  
Assistant United States Attorney

4  
5 Dated: December 12, 2024

6 /s/ CLEMENTE JIMENEZ  
CLEMENTE JIMENEZ  
Counsel for Defendant  
MIGUEL CAMARGO, JR.

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10 **ORDER**

11 IT IS SO FOUND AND ORDERED this 12<sup>th</sup> day of December, 2024.

12  
13 /s/ Daniel J. Calabretta  
14 THE HONORABLE DANIEL J. CALABRETTA  
15 UNITED STATES DISTRICT JUDGE  
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